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**From:** Brown, Chad (ECY) [CHBR461@ECY.WA.GOV]  
**Sent:** 8/18/2015 5:26:28 PM  
**To:** mgil461@ECY.WA.GOV [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c7ab63dfcb56401284b16f8d24341337-mgil461@ECY.WA.GOV]; Braley, Susan (ECY) [SUBR461@ECY.WA.GOV]  
**CC:** cnie461@ecy.wa.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=084bdcc64365427fa3795d176eb53d94-cnie461@ecy.wa.gov]; Szelag, Matthew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f1e48230d96943f8acb72810e32ce8d6-Szelag, Matthew]; Bartlett, Heather (ECY) [heba461@ECY.WA.GOV]; Lizon, Patrick (ECY) [pliz461@ECY.WA.GOV]  
**Subject:** Request for meeting from Kitsap County - recreational criteria  
**Attachments:** Letter from Kitsap\_8-14-2015.pdf

All -

We received the attached letter from Mindy Fohn, Water Quality Mgr., Kitsap Public Works. To my knowledge, this is not an official petition since the APA is not cited.

**Background:**

Kitsap is requesting a meeting with Ecology to discuss a change in the recreational designated use of streams and rivers within the Urban Growth Area. This is a topic that we have discussed with Mindy in several venues over the past few years, but this is the first request for a separate meeting on the topic. Specifically she requests that those streams within the state's Urban Growth Areas, which are designated as Extraordinary Primary Contact, be changed to Primary Contact recreation for which the bacteria criteria are less stringent. Kitsap County's goal in this request is to, *"revis[e] standards to better reflect todays land use and growth patterns as directed by law while attaining beneficial uses for shellfish harvest and contact recreation."*

Some of these streams are specifically protected for extraordinary primary contact use by their use designation in table 602 and, however the majority of streams for which she is requesting this change, are designated as such because they flow to Extraordinary Aquatic Life marine waters as provided by the general designation rules under 173-201A-600(1)(iv).

Here is the letter...

She requests a meeting with Ecology and suggests including EPA if needed – I have copied Matt Szelag.

**Relation to upcoming Recreational Criteria work:**

Although we are scheduled to modify recreational criteria in the coming year, we do not currently have plans to change the designated recreational uses. Ultimately, revisions to the recreational use standards, including new bacteria indicator(s), may remedy the concerns that Kitsap is expressing. However, we will need to be clear that use changes to the standards require a use attainability analysis and changes to part 600 of the SWQS. Our draft plan includes a review of the bacteria indicator and numeric criteria in part 200 but does not include a review of designated uses in part 600.

**Recommended Actions:**

I think a meeting with Kitsap County may be helpful to document their concerns and provide the county with our recreational criteria work plan. But since this is a discussion that we have had several times with the County, I also think a letter documenting our response to the request will be the most useful action as we move into rulemaking.

Let me know if any of you have any immediate thoughts on this and I will look toward our weekly standards meeting tomorrow or next week to discuss next steps.

Thanks,

Chad

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